

REMARKS

The FINAL Office Action mailed on June 1, 2007, has been received and its contents have been carefully considered. The FINAL Office Action continued to reject all claims 1-12. In this Amendment, Applicant has amended claims 1-3, 5-7, 14, 17-18, 20, and 21 to further define certain aspects of those claimed embodiments. The amended features are clearly described in the original application, including the drawings, so this amendment introduces no new matter into the application. Claims 1 and 14 are the independent claims, and all claims remain pending in the application. For at least the following reasons, it is submitted that this application is in condition for allowance.

Turning now to the substantive rejections, the Office Action has rejected claims 1, 3, 4, 5, 6, 8, and 11 as allegedly unpatentable over *Yamane* (US 2006/0061556) in view of *Jung* (US 6,657,560). Independent claim 1 has been amended, and it is submitted that the amended claim is patentably distinguishable over the cited reference for at least the following reasons.

Amended independent claim 1 defines a keyboard module comprising a carrier device, a keyboard, and a navigator button. The keyboard for entering text message is mounted on the carrier device. The keyboard includes a plurality of keys arranged as a rectangular array, and a plurality of intersection regions disposed therebetween. The navigator button is mounted on the carrier device and located within the keys of the keyboard. The navigator button is disposed at one of the intersection regions. The navigator button has a cross-shaped configuration with four direction buttons at four

extremities of the navigator button, respectively, and the keys of the keyboard have four keys each being located between two neighboring direction buttons.

The Office Action acknowledged that *Yamane* fails to disclose that navigator button is disposed at one of the intersection regions of the rectangular array, but stated that *Jung* does. However, *Jung* relates to a rounded keypad wherein a plurality of control keys are mounted in a circular or other selected configuration to be operated by one or both thumbs. These control keys include a first group of high using frequency keys corresponding to letters of the English alphabet positioned in a rounded arrangement and a second group of low using frequency keys arranged outwards and concentric with the first group (col. 2, lines 47-56). These control keys arranged in a hollow rectangle or rotundity, rather than arranged in rows and columns to constitute an array. It is noted that control keys of *Jung* are not arranged as a rectangular array even if the contour of these control keys is rectangular (see FIG. 8d). The rounded keypad also includes function keys, as relied on by the Examiner as allegedly teaching of the navigator button, generally located in the center of the control keys (see col. 2, lines 63-65). The function keys of *Jung*, which are located in the hollow of the rectangular arrangement of the control keys, are not equal to the navigator button of the claimed embodiment, which is disposed at one of the intersections of the keys arranged as the rectangular array. *Jung* therefore fails to disclose that the navigator button is disposed at one of the intersection regions of the keys arranged as a rectangular array, as recited in claim 1. As such, even if the teaching of *Yamane* and *Jung* were combined, the combination would not result in the claimed embodiments.

Further, *Yamane* disclose that a cell phone includes twelve character-input keys 55 arranged in a matrix of 3 columns x 4 rows in region 53 (see paragraph [0034] & FIG. 1) and a cross-shaped operating key 67 functioning as a scroll-key arranged in another region 56 (see paragraph [0039] & FIG. 1). Each of the character-input keys having first and second ends to input two different characters (paragraph [0009]), but the above method of assigning two phonetic letters to every character-input keys cannot accommodate all 26 phonetic letters (see paragraph [0036]). As a result, four additional keys 57 labeled must be added to the keypad (see paragraph [0036] & FIG. 1). *Yamane* appears to teach that the cross-shaped operating keys, of which four keys are located at four corners, are separated from those twelve matrix-like character-input keys, which is opposite to the claimed embodiments, in which the navigator button is located within the keys arranged as a rectangular array comprising plural intersection regions. Applicant, therefore, submits that it would not have been obvious to one of ordinary skilled in the art at the time the invention was made to make a combination as proposed by the Examiner because *Yamane's* reference teaches away from the claimed invention.

Moreover, the occupied size of the keyboard module of *Yamane* is increased because four more keys are added to the keyboard. The keypad of *Jung*, in which the function keys are surrounded by the control keys, is capable of being operated with only one finger (see abstract), instead of reducing the size of the keypad. In contrast, the navigator button of the claimed embodiment is disposed at one of the intersection regions, which inherently exists in the rectangular array, so that the size of the keyboard module of the present embodiment and each of four keys is located between two

neighboring direction buttons of the can be reduced. The result is neither anticipated nor rendered obvious by the cited reference.

As such, it is therefore submitted independent claim 1, as well as claims 2-13 dependent therefrom, are not anticipated by (or rendered obvious by) the cited art. As such, the rejection should be withdrawn.

The Office Action also rejected claims 14-22 as allegedly unpatentable over *Yamane* (US 2006/0061556) in view of *Miller* (US 4,974,183) and further in view of *Jung*(US 6,657,560). Claim 14 has been amended so that the amended claim 14 includes limitations similar those defining limitations of claim 1 (discussed above). Accordingly, independent claim 14 defines over the cited art for reasons similar to claim 1 (set forth above). As such, independent claim 14, as well as claims 15-22 dependent therefrom, are not anticipated by (or rendered obvious by) the cited art. As such, the rejection should be withdrawn.

For at least the foregoing reasons, it is submitted that this application is in condition for allowance and such an allowance notice is earnestly solicited.

Should the Examiner feel that a conference would help to expedite the prosecution of the application the Examiner is hereby invited to contact the undersigned counsel to arrange for such an interview.

A credit card authorization is provided herewith to cover the fee associated with the accompanying RCE application. No additional fee is believed to be required. If, however, any additional fee is deemed to be payable, you are hereby authorized to charge such fee to deposit account 20-0778

Respectfully submitted,

/Daniel R. McClure/

By:

Daniel R. McClure
Registration No. 38,962

Thomas, Kayden, Horstemeyer & Risley, LLP
100 Galleria Pkwy, NW
Suite 1750
Atlanta, GA 30339
770-933-9500